

## ENFORCEMENT CONSULTANTS REPORT ON SCOPING OF PRIORITIZED NON-TRAWL SECTOR AREA MANAGEMENT MEASURES

The Enforcement Consultants (EC) have reviewed the material associated with Agenda Item F.3, Scoping of Prioritized Non-trawl Sector Area Management Measures and provides the following comments. The EC supports the Council's effort to evaluate potential non-trawl sector groundfish area management modifications that may improve access and opportunity for non-trawl sector fishery participants. The EC requests and looks forward to consultation with appropriate advisory bodies and the Council as proposals are developed so that enforcement concerns can be identified and addressed early. The EC recommends the following general enforcement consideration when evaluating changes to and fishing within the Non-Trawl Rockfish Conservation Areas (NT-RCA):

Area Modifications: The EC recommends that any changes to the NT-RCA boundary lines be clearly defined and done infrequently. Frequent changes to boundary lines challenge both enforcement and fishers. A change to the boundary line is preferred to allowing limited fishing within the NT-RCA.

Fishing inside the NT-RCA: The EC recommends that tight measures to facilitate monitoring be put in place for any fishing that is permitted within a conservation area. This includes continued limits on the type of gear that can be carried on board the vessel and restricting fishing to the NT-RCA for the duration of the trip. The expanded use of observers or Electronic Monitoring may be appropriate in certain circumstances. The EC is concerned that without tight controls, effective monitoring and enforcement of the RCA would require a significant increase of resources.

Declaration Codes: VMS, used in combination with fishery Declaration Codes, is our most effective tool for monitoring vessel activity and determining if additional action by enforcement is needed. The EC recommends that new declaration codes be considered for groundfish vessels permitted to fish within the NT-RCA so they are easily distinguished from vessels that must maintain a continuous transit when moving through the area.

The Enforcement Consultants (EC) have also reviewed F.3, Attachment 1 and F.3.a Supplemental SAS Report 1 and recommend that groundfish retention limits in relation to salmon be clearly identified as referring to weight of fish landed.